Remarks

Applicants respectfully request reconsideration of this application as amended. Claims 1-29 have been amended. No claims have been cancelled. Therefore, claims 1-29 are presented for examination.

Claim 1 stands rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Applicants submit that claim 1 has been amended to appear in proper condition for allowance.

Claim 1 stands rejected under 35 U.S.C. §101 because the claimed invention is directed to non-statutory subject matter. Applicants submit that claim 1 has been amended to appear in proper condition for allowance.

Claims 1, 5-9, 13-17 and 21-29 stand rejected under 35 U.S.C. §102(e) as being anticipated by Allen et al. (U.S. Patent No. 6,895,453). Applicants submit that the present claims are patentable over Allen.

Allen discloses remote devices connected to a Fibre Channel network using a bridge. The bridge serves as a gateway to SCSI devices. Each of the SCSI devices includes a unique identifier. The respective device identifiers may include the vendor identifier for the device, the product identifier for the device, and the serial number corresponding to the device. Allen further discloses that the SCSI devices receive the device identifier after a device swap occurs. This device identifier is compared with the previous device identifier. Because the device identifiers do not match, the Fibre Channel device determines that a SCSI device change has taken place and is able to take corrective action without compromising data

integrity on either the SCSI device or in the Fibre Channel device attached to Fibre Channel interconnect. See Allen at col. 8, ll. 65 – col. 9, ll. 28.

Claim 1 of the present application recites retrieving a first vendor identifier (ID) from a table, retrieving a second vendor ID from the table and generating a virtual ID by randomizing the first vendor ID and the second vendor ID. Applicants submit that Allen fails to disclose retrieving vendor IDs from a table and generating a virtual ID by randomizing the retrieved IDs. Thus, claim 1 is patentable over Allen.

Claims 2-8 depend from claim 1 and include additional features. Therefore, claims 2-8 are also patentable over Allen.

Independent claims 9, 17 and 25 also include a process of retrieving a first vendor identifier (ID) from a table, retrieving a second vendor ID from the table and generating a virtual ID by randomizing the first vendor ID and the second vendor ID. Thus, for the reasons described above with respect to claim 1, claims 9, 17 and 25 are also patentable over Allen. Since dependent claims 10-16, 18-24 and 26-29 depend from claims 9, 17 and 25, respectively, and include additional features, claims 10-16, 18-24 and 26-29 are also patentable over Allen.

Claims 2, 3, 4, 10, 11, 12, 18, 19, and 20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Allen in view of Levitt (U.S. Patent No. 5,787,012). Applicants submit that the present claims are patentable over Allen even in view of Levitt.

Levitt discloses an integrated circuit that includes a first metal layer with first layer identification signal writing circuitry connections to produce first metal layer circuit identification signals. The integrated circuit also has a second metal layer with second layer identification signal writing circuitry connections to produce second metal layer circuit

identification signals. Logic circuitry in the first metal layer has input connections to the first layer identification signal writing circuitry connections and the second layer identification signal writing circuitry connections. The logic circuitry combines the first metal layer circuit identification signals and the second metal layer circuit identification signals to produce a circuit identification number. The value of the circuit identification number can be changed by altering the first layer identification signal writing circuitry connectors or the second layer identification signal writing circuitry connections. Thus, the value of the circuit identification number can be easily changed at the metal layer at which revisions are made. See Levitt at Abstract.

However, Levitt does not disclose or suggest retrieving vendor IDs from a table and generating a virtual ID by randomizing the retrieved IDs. As discussed above, Allen does not disclose or suggest such a feature. Accordingly, any combination of Allen and Levitt also would not disclose or suggest the feature. As a result, the present claims are patentable over Allen in view of Levitt.

Applicants respectfully submit that the rejections have been overcome and that the claims are in condition for allowance. Accordingly, applicants respectfully request the rejections be withdrawn and the claims be allowed.

The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

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